



"I will stand for my client's rights.
I am a trial lawyer."
-Ron Motley (1944-2013)

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April 20, 2020

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RE: Production of Custodial Files for: Angie Brace, John Ellis, Justin Antle, Greg Fuller, Robert Wilhelm, Gene Baumgardner

Dear Counsel,

On 4/6/2020, Defendants filed a Motion to Compel (Document 283) and Memorandum in Support (Document 284), requesting 6 additional custodial files. In response, Plaintiffs filed a Memorandum in Opposition on 4/15/2020 (Document 326). We write to update the status of these custodial files. In an effort to keep on track, Plaintiffs will withdraw their objections to producing custodial files for the below requested individuals:



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1. Angie Bracey, Executive Assistant to Mayor Steve Williams
2. John Ellis, Huntington Police Captain
3. Justin Antle, Huntington Deputy Fire Chief
4. Greg Fuller, Huntington Former Fire Chief
5. Robert Wilhelm, Huntington Former Finance Director
6. Gene Baumgardner, Huntington Former Police Chief

The City of Huntington has searched for, identified, collected and subsequently produced responsive documents for the above requested custodians. The City of Huntington has been unable to locate responsive documents to produce for Robert Wilhelm and Gene Baumgardner. The particulars of this production will be outlined in the production letter for Volume 39 to follow. Accordingly, the Motion to Compel with regard to these 6 additional requested Huntington custodians should be considered moot.

Thank you,

A handwritten signature in black ink, appearing to read "Tope Leyimu". The signature is fluid and cursive, with a horizontal line through the end of the last name.

Tope Leyimu
Counsel for Plaintiff, City of Huntington

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